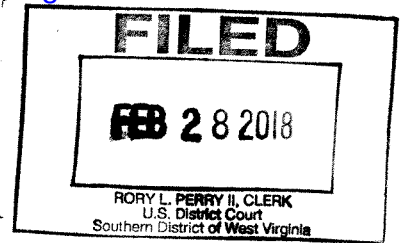


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA



CHRISTOPHER RUSH

14667-088

(Enter above the full name of the plaintiff  
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

**VERSUS**

**CIVIL ACTION NO.** 2:18-cv-0364

(Number to be assigned by Court)

BRAD DOUGLAS, Jail Administrator

ALLISON BRYANT, Deputy Jailer

(Enter above the full name of the defendant  
or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes \_\_\_\_\_

No ☒ \_\_\_\_\_

B.

If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs:

N/A

Defendants:

N/A

2. Court (if federal court, name the district; if state court, name the county);

N/A

3. Docket Number:

N/A

4. Name of judge to whom case was assigned:

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit:

N/A

7. Approximate date of disposition:

N/A

**II. Place of Present Confinement:** CARTER COUNTY DETENTION CENTER

A. Is there a prisoner grievance procedure in this institution?

Yes ✓ No       

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes        No ✓

C. If you answer is YES:

1. What steps did you take? N/A

2. What was the result? N/A

D. If your answer is NO, explain why not: The incident occurred at the  
South Central Regional Jail in West Virginia.

**III. Parties**

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Christopher Rush, Reg. No. 14667-088

Address: 13 Crossbar Road, Grayson, Kentucky 41143

B. Additional Plaintiff(s) and Address(es): N/A

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: BRAD DOUGLAS

is employed as: Jail Administrator

at South Central Regional Jail, Charleston, West Virginia

D. Additional defendants: ALLISON BRYANT

Deputy Jailer

South Central Regional Jail, Charleston, West Virginia

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On October 17, 2017, at 11:25 a.m., defendant, Allison Bryant, ordered me to step by the "cover room", and as I did, Ms. Bryant stepped in behind me and ordered me to "whip it out", indicating my genitalia. I told Ms. Bryant to "hold on" as another deputy jailer was entering the area. The new officer was Corporal Vandel (sp.?), and he was telling all trustees it was lunchtime. I worked as a trustee at South Central Regional Jail. Ms. Bryant assumed I was telling Cpl. Vandel about the incident and in an effort to cover up her actions she

**IV. Statement of Claim (continued):**

wrote up a "Rule Violation Report" claiming I paid her \$20.00 for some cigarettes. On October 19, 2017, Cpl. Roop and Deputy Kinder were the arraigning officers and found me guilty of the charges without any evidence and solely based on Ms. Bryant's statement. Ms. Bryant was caught lying on tape, and I told the officers she was lying. I was sent to the hole for 15 days. Ms. Bryant was the officer overseeing the hole, she refused to let me shower, and my box (intercom) did not work. Ms. Bryant helped another inmate escape 3-days later. I was kept in the hole for 19 days in order to prevent me from discussing these matters

**V. Relief**

— cont.  
see attached

**State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.**

I am asking that the defendants be held accountable for their actions and non-actions which jeopardized my personal safety and violated my civil rights. I am further seeking legal damages and compensatory damages in the amount of \$1,000,000 and punitive damages in the amount of \$3,000,000.

**V. Relief (continued)):**

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**VII. Counsel**

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

N/A

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_

No X

If so, state the name(s) and address(es) of each lawyer contacted:

N/A

If not, state your reasons: I cannot afford to hire counsel.

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes \_\_\_\_\_

No X

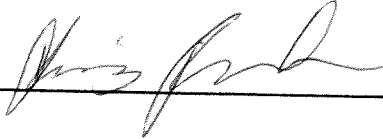
## IV. Statement of Claim - continued

with investigators that were at the jail for these events. I was eventually able to speak with people from the Central Office and I was released from the hole the next day. I suffered a stroke while in the hole after 13 days - officer White said I had "stroke-like symptoms"; and I could not use the intercom system to call for help due to it being broken. This caused me to go into a state of high anxiety and panic as I began to fear for my life. I now take anxiety medication every day to deal with the trauma. The staff was willfully negligent and deliberately indifferent to my medical situation and personal safety. I filed a grievance against Ms. Bryant for the sexual misconduct and exhausted my administrative remedies without obtaining any results. Also, on Tuesday, 10-17-2017, at 2:30 p.m. (after the incident of sexual misconduct by Ms. Bryant), I came out of a scheduled visit and was attacked by way of assault and battery (punch to the face) from another inmate, while the guards stood around and watched and never did anything. A similar incident occurred after I came back from court in November, 2017, where inmate Charles Walker assaulted me. My criminal defense lawyer saw my bruised and battered face after the incident the next day and asked me what had happened. I explained the incident to my lawyer, Brian Yost, and told him that, once again, the guards did nothing to stop the assault.

If so, state the lawyer's name and address:

N/A

Signed this 22<sup>nd</sup> day of February, 2018.



Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 22, 2018  
(Date)



Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)